

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

IN RE

ANITA LANGFORD HADDEN

Debtor

Case No. 19-10100-KHK  
Chapter 7

U.S. BANK NATIONAL ASSOCIATION,  
AS TRUSTEE, SUCCESSOR IN  
INTEREST TO BANK OF AMERICA,  
NATIONAL ASSOCIATION, AS  
TRUSTEE, SUCCESSOR BY MERGER  
TO LASALLE BANK NATIONAL  
ASSOCIATION, AS TRUSTEE FOR  
MERRILL LYNCH MORTGAGE  
INVESTORS TRUST, MORTGAGE  
LOAN ASSET-BACKED  
CERTIFICATES, SERIES 2006-MLN1  
8950 Cypress Waters Blvd  
Coppell, TX 75019

Motion No.

Movant

v.

ANITA LANGFORD HADDEN  
15917 Canada Goose Loop  
Woodbridge, VA 22191

and

JANET M. MEIBURGER  
CHAPTER 7 TRUSTEE  
The Meiburger Law Firm, PC  
1493 Chain Bridge Road, Suite 201  
McLean, VA 22101

Respondents

**MOTION FOR RELIEF FROM AUTOMATIC STAY**

COMES NOW, U.S. Bank National Association, as Trustee, successor in interest to Bank of America, National Association, as Trustee, successor by merger to LaSalle Bank National Association, as Trustee for Merrill Lynch Mortgage Investors Trust, Mortgage Loan Asset-Backed Certificates, Series 2006-MLN1, its successors and/or assigns, movant, by its attorneys, Mark D. Meyer, Esq., and Rosenberg & Associates, LLC, and respectfully represents as follows:

MARK MEYER

DC BAR 475552  
MD BAR 15070  
VA BAR 74290

ROSENBERG &  
ASSOCIATES, LLC  
4340 East West Highway  
SUITE 600  
BETHESDA, MD 20814  
(301) 907-8000  
FILE NUMBER: 72503

1. Jurisdiction is based on 11 U.S.C. Section 362(d)-(f).
2. On or about January 10, 2019, Anita Langford Hadden ("Debtor") filed a Voluntary Petition in the Court under Chapter 7 of the Bankruptcy Code.
3. Janet M. Meiburger is the Chapter 7 trustee of the Debtor's estate.
4. At the time of the initiation of these proceedings, the Debtor owned a parcel of fee simple real estate improved by a residence with a legal description of "Lot 8, Section Four (4), Riverside Station, as the same appears duly dedicated, platted and recorded as Instrument No. 200412220216286 and as shown on a corresponding Plat recorded as Instrument No. 200412220216287, among the Land Records of Prince William County, Virginia." also known as 15917 Canada Goose Loop, Woodbridge, VA 22191 (hereinafter "the subject property").
5. The subject property is encumbered by a Deed of Trust securing the note, which is currently held by the movant. Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase order, invoices, itemized statements of running accounts, contracts, judgments, mortgages and security agreements in support of right to seek a lift of the automatic stay and foreclose if necessary.
6. U.S. Bank National Association, as Trustee, successor in interest to Bank of America, National Association, as Trustee, successor by merger to LaSalle Bank National Association, as Trustee for Merrill Lynch Mortgage Investors Trust, Mortgage Loan Asset-Backed Certificates, Series 2006-MLN1 directly or through an agent, has possession of the promissory note and held the note at the time of filing of the Movant's Motion for Relief from the Stay. The promissory note has been duly indorsed.
7. The total amount due under the Deed of Trust securing the Movant as of January 14, 2019, including attorney's fees and court costs, is approximately \$301,106.20.
8. The Debtor is in default under the Deed of Trust, and the Movant has accelerated the entire balance of the Note and Mortgage and interest continues to accrue.
9. The Debtor is behind in his/her monthly mortgage payments, and equity in the Debtor's residence is dissipating.
10. The Movant lacks adequate protection of its interest in the subject property.

MARK MEYER  
DC BAR 475552  
MD BAR 15070  
VA BAR 74290

ROSENBERG &  
ASSOCIATES, LLC  
4340 East West Highway  
SUITE 600  
BETHESDA, MD 20814  
(301) 907-8000  
FILE NUMBER: 72503

11. The Movant has been and continues to be irreparably injured by the stay of Section 362 of the Bankruptcy Code, which prevents the Movant from enforcing its rights under the Note and Deed of Trust.

12. Cause exists for lifting the automatic stay imposed by Section 362 of the Bankruptcy Code to enable the Movant to enforce its rights under its Note and Deed of Trust.

WHEREFORE, the Movant, U.S. Bank National Association, as Trustee, successor in interest to Bank of America, National Association, as Trustee, successor by merger to LaSalle Bank National Association, as Trustee for Merrill Lynch Mortgage Investors Trust, Mortgage Loan Asset-Backed Certificates, Series 2006-MLN1 its successors and/or assigns, respectfully requests that this Honorable Court:

1. Enter an order terminating the automatic stay imposed by Section 362 of the Bankruptcy Code to enable it to proceed with a foreclosure sale, accept a deed in lieu or agree to a short sale of the real property and improvements located at 15917 Canada Goose Loop, Woodbridge, VA 22191; and

2. Grant such other and further relief as may be just and necessary.

/s/ Mark D. Meyer, Esq.

Mark D. Meyer, Esq.

VA Bar 74290

Rosenberg & Associates, LLC  
4340 East West Highway, Suite 600  
Bethesda, MD 20814  
301-907-8000

MARK MEYER

DC BAR 475552  
MD BAR 15070  
VA BAR 74290

ROSENBERG &  
ASSOCIATES, LLC  
4340 East West Highway  
SUITE 600  
BETHESDA, MD 20814  
(301) 907-8000  
FILE NUMBER: 72503

**CERTIFICATE OF SERVICE**

I hereby certify that on the 18th day of January, 2019, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing Motion for Relief from the Automatic Stay will be served electronically by the Court's CM/ECF system on the following:

Janet M. Meiburger, Trustee

I hereby further certify that on the 18th day of January, 2019, a copy of the foregoing Motion for Relief from the Automatic Stay was also mailed first class mail, postage prepaid to:

Anita Langford Hadden  
15917 Canada Goose Loop  
Woodbridge, VA 22191

/s/ Mark D. Meyer, Esq.

Mark D. Meyer, Esq.

MARK MEYER

DC BAR 475552  
MD BAR 15070  
VA BAR 74290

ROSENBERG &  
ASSOCIATES, LLC  
4340 East West Highway  
SUITE 600  
BETHESDA, MD 20814  
(301) 907-8000  
FILE NUMBER: 72503